UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA) Criminal Case No. 21- <u>cr-43</u> -LM-01/02)
v.)
MICHAEL RACINE and RALPHIE GARCIA)))

INDICTMENT

The Grand Jury charges:

COUNT ONE

Conspiracy to Distribute a Controlled Substance 21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(C)

From an unknown date, but at least by on and about August 7, 2019, and continuing to an unknown date not before August 26, 2019, in the District of New Hampshire and elsewhere, the defendants,

MICHAEL RACINE

and

RALPHIE GARCIA,

willfully combined, conspired, confederated and agreed each other, and with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to distribute controlled substances, namely cocaine base, commonly known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

A TRUE BILL

Dated: March 15, 2021 /s/ Foreperson
FOREPERSON

JOHN J. FARLEY ACTING UNITED STATES ATTORNEY

> /s/ Charles L. Rombeau Charles L. Rombeau

By: Charles L. Rombeau Assistant U.S. Attorney